Message

From: Howanitz, Jason [Jason.Howanitz@jcdh.org]

Sent: 10/19/2022 6:04:32 PM

To: Palmer, Darren [Palmer.Darren@epa.gov]

CC: amber.mcdaniel@jcdh.org

Subject: Re: Draft Final Network Plan Response

Attachments: 2022.10.Palmer.Alabama.JCDH Network Plan Response.docx

EPA should provide more context with regards to the FEM issue. EPA should explain that due to an inherent bias in the instrument JCDH is reinstalling a FRM. Currently the FEM 640x doesn't meet NAAQS compatibility criteria. EPA is aware of the issue and is working with the manufacturer to correct the issue.

Also, we say not operating as "cold-idle" is no longer accurate. Bluestone will require an extensive rebuild not repairs. This seems to continue to be a very important misunderstanding.

Thanks

Jason Howanitz, MSCE, PE Principal Air Pollution Control Engineer Air and Radiation Protection Division 205-930-1284

On Oct 18, 2022, at 12:40 PM, Palmer, Darren < Palmer. Darren@epa.gov> wrote:

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The only parts to glance over that are probably of most interest are the cover letter, and then the following sections in the technical review in order of appearance:

- 1. at the front network changes, public comments, PM2.5 FEM.
- 2. near the middle the SO2 specific section which mirrors the cover letter
- near the end the EJ and ARP sections (which you have previously seen), and
- 4. then at the very end, Ryan added a QA section.

Everything else has remained essentially the same as last year.

I am starting this document routing through the signature chain in parallel to your review since we only have a week to get Caroline's signature on it. I can set up a time to discuss any of it this week however since it will take a few days to get through my immediate management.

Darren Palmer

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